

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BAOYANG CHEN,	:	CASE NO. 1:17-cv-00460-MRB
		Judge Michael R. Barrett
Plaintiff,	:	
 v.	:	<b>JOINT MOTION FOR EXTENSION TO</b>
		<b>SUBMIT PROPOSED FINAL</b>
GSC OPPORTUNITIES, LP, et al.,	:	<b>PRETRIAL ORDER</b>
 Defendants.	:	

---

Now comes Plaintiff Baoyang Chen and Defendant Gold Star Chili, Inc., through their respective counsel, and hereby move the Court for an extension to Monday, May 12, 2025, to submit their Proposed Final Pretrial Order. The parties require two additional business days to complete the proposed order and their schedules have been challenging recently with court appearances and briefing deadlines in other matters.

Accordingly, the Parties request an extension to Monday, May 12, 2025, to submit the Proposed Final Pretrial Order.

/s/ Christopher D. Cathey  
Christopher D. Cathey, Esq. (0071231)  
Taylor English Duma LLP  
One Biscayne Tower  
2 S Biscayne Boulevard, Suite 2500  
Miami, Florida 33131  
Telephone: 786-840-1444  
Fax: 770-434-7376  
[ccathey@taylorenghish.com](mailto:ccathey@taylorenghish.com)  
**Attorney for Plaintiff Baoyang Chen**

/s/ Paul T. Saba  
Paul T. Saba, Esq. (0063723)  
Jeffrey M. Nye, Esq. (0082247)  
SSP Law Co., LPA  
2623 Erie Avenue  
Cincinnati, OH 45208  
513-533-6714  
513-533-2999 (fax)  
[pts@sspfirm.com](mailto:pts@sspfirm.com)  
[jmn@sspfirm.com](mailto:jmn@sspfirm.com)  
**Attorneys for Defendant Gold Star Chili,  
Inc.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8th day of May, 2025, I electronically filed the foregoing with the Clerk of the Court by using the Court's CM/ECF E-Filing System, which will send a notice of electronic filing to all counsel of record at their respective designated e-mail addresses, including:

Paul T. Saba, Esq.  
Jeffrey M. Nye, Esq.  
Stagnaro, Saba & Patterson  
2623 Erie Ave Ste 2623  
Cincinnati, OH 45208  
pts@sspfirm.com  
jmn@sspfirm.com

/s/ Christopher D. Cathey  
Christopher D. Cathey